

Renard Communications Corp.

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July 16, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: Comments on
MM Docket No. 96-120, RM-7651
"Grandfathered Short-Spaced FM Stations"

Dear Mr. Caton,

Enclosed please find an original and four (4) copies of comments on the above-captioned Notice of Proposed Rule Making filed on behalf of Renard Communications Corp. An additional five (5) copies are enclosed for each of the Commissioners.

If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,



Craig L. Fox
President

Enclosure

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3. In that same rule making it was decided to uniformly fully protect Class B stations to their 0.5 mv/m contours. Although the minimum distance separations for Class B stations on co-channel and first adjacent channels were not changed, second and third adjacent (400 and 600 kHz) channel spacings were increased by 10 km. from 64 km. (40

miles) to 74 km. (46 miles). Thus, second and third adjacent channel Class B stations spaced at distances less than 74 km. became *de facto* short-spaced stations.

4. The present rules, including Section 73.213, do not make provisions for these stations to be able to modify their facilities as short-spaced stations. While it may be an unwritten policy that these stations can modify their facilities as long as they do not shorten their distances to other second or third adjacent channel stations to which they are short-spaced, this policy is unfounded in its reasoning as will be explained.


5. Class B stations which are short-spaced on second and third adjacent channels can no longer protect the 0.5 mv/m contours of the station to which they are short-spaced because they are inside the protected 0.5 mv/m contour. Rather, these short-spaced stations have become "replacement services" identical to those stations which are in the pre-1964 category.

6. In that regard, and because they are now replacement services, nothing is to be gained by only allowing a station in this category to increase its distance to another short-spaced station on a second or third adjacent channel. In fact, as is the case with the pre-1964 stations, less interference will occur to both stations' service areas as the stations move closer together due to the desired to undesired signal ratios increasing as the distance between the stations decreases. Moving closer together would have the net effect of decreasing the area of interference within each station's protected contour. Thus, the same rationale to exempt pre-1964 short-spaced stations from second and third adjacent channel spacing requirements equally applies to Class B stations now in this category.

7. It is noted that because only Class B stations on second and third adjacent channels whose distances are less than 74 km. (46 miles) are involved, the number of stations in this category is not large. Nonetheless, it would be appropriate to address this anomaly in this rule making due to the similar technical nature of these now grandfathered short-spaced stations.

Respectfully submitted,

RENARD COMMUNICATIONS CORP.

By: 
Craig L. Fox, President

Dated: July 16, 1996